UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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VIACOM INTERNATIONAL, INC., COMEDY PARTNERS, COUNTY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION, LLC,

Plaintiffs,

vs. No. 07-CV-2203

YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,

Defendants.

----------X

THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED, BOURNE CO., et al., on behalf of themselves and all others similarly situated,

Plaintiffs,

vs. No. 07-CV-3582

YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,

Defendants.

----------X

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF ZAHAVAH LEVINE

SAN FRANCISCO, CALIFORNIA

THURSDAY, APRIL 2, 2009

BY: KATHERINE E. LAUSTER, CSR 1894, RPR, CRR, CLR

Job No. 16721

LEVINE

APRIL 2, 2009

10:23 A.M.

HIGHLY CONFIDENTIAL VIDEOTAPED DEPOSITION OF ZAHAVAH LEVINE, at SHEARMAN & STERLING, 525 Market Street, Suite 1500, San Francisco, California, pursuant to notice, before me, KATHERINE E. LAUSTER, CLR, CRR, RPR, CSR License No. 1894.

LEVINE

A P P E A R A N C E S:

FOR THE LEAD PLAINTIFFS AND PROSPECTIVE CLASS:

PROSKAUER ROSE, LLP
BY: WILLIAM M. HART, Esq.
1585 Broadway
New York, New York 10036-8299
phone: 212.969.3095
fax: 212.969.2900
whart@proskauer.com

FOR THE PLAINTIFFS VIACOM INTERNATIONAL, INC.:

JENNER & BLOCK, LLP
BY: JAY C. COX, Esq.
1099 New York Avenue, NW
Suite 900
Washington, DC 20001
phone: 202.639-6000
fax: 202.661.4998
JamesCox@jenner.com

LEVINE

A P P E A R A N C E S: (Continued)

FOR THE DEFENDANTS YOUTUBE, INC., YOUTUBE and GOOGLE:

WILSON, SONSINI, GOODRICH & ROSATI
BY: MAURA L. REES, Esq.
DAVID H. KRAMER, Esq.
650 Page Mill Road
Palo Alto, California 94304-1050
phone: 650.493.9300
fax: 650.565.5100
mrees@wsgr.com
dkramer@wsgr.com

FOR THE DEFENDANT GOOGLE, INC.:

GOOGLE, INC.
BY: TIMOTHY L. ALGER, Esq.
Deputy General Counsel
1600 Amphitheatre Parkway
Mountain View, California 94043
phone: 650.214.3174
fax: 650.887.1765
timalger@google.com

Also Present: Lou Meadows, Videographer

LEVINE

SAN FRANCISCO, CALIFORNIA

THURSDAY, APRIL 2, 2009; 10:23 A.M.

10:23:32 THE VIDEOGRAPHER: On the record.

10:23:33 This is today's videotaped deposition of
10:23:37 Zahavah Levine, taken on April 2nd, 2009, at
10:23:42 Shearman & Sterling, 525 Market Street, 15th floor,
10:23:46 in San Francisco, California.

10:23:47 In the matter of Viacom International vs.
10:23:49 YouTube, Inc., and The Football Association Premier
10:23:49 League Limited, et al., vs. YouTube, Inc., et al.,
10:23:56 Case Number 07-CV-2103 and 07-CV-3582, in the United
10:24:06 States District Court For the Southern District of
10:24:06 New York.

10:24:09 My name is Lou Meadows, and I represent
10:24:12 David-Feldman Worldwide, located at 600 Anton
10:24:16 Boulevard, Suite 1100, in Costa Mesa, California.

10:24:23 We are now commencing at 10:22 a.m.

10:24:23 Will all present please identify
10:24:25 themselves and state whom they represent.

10:24:28 MR. HART: Bill Hart, Proskauer Rose, for
10:24:29 the class plaintiffs.

10:24:32 MR. COX: Jay Cox, Jenner and Block, for
10:24:33 the Viacom Company.
10:24:35 MR. KRAMER: Dave Kramer for YouTube and
10:24:37 Google. With me is Maura Rees from my firm, and Tim
10:24:38 Alger of Google.
10:24:41 THE VIDEOGRAPHER: Sir, I can barely hear
10:24:44 you. Could you raise your microphone up?
10:24:46 MR. KRAMER: Yeah. Hm, that's never
10:24:46 happened.
10:24:46 Dave Kramer, Wilson Sonsini, for Google
10:24:51 and YouTube. With me is Maura Rees from my firm and
10:24:56 Tim Alger from Google.
10:24:57 THE VIDEOGRAPHER: Okay.
10:25:00 THE WITNESS: Zahavah Levine from YouTube.
10:25:01 THE VIDEOGRAPHER: If there are no
10:25:01 stipulations, the court reporter may now administer
10:25:01 the oath.
10:25:01 THE REPORTER: Will you raise your right
10:25:01 hand, please.
10:25:01 Do you solemnly state, under penalty of
10:25:01 perjury, the testimony you are about to give will be
10:25:01 the truth, the whole truth, and nothing but the
10:25:01 truth?
10:25:10 THE WITNESS: I do.

LEVINE

ZAHAVAH LEVINE,

having been sworn as a witness

testified as follows:

EXAMINATION

BY MR. HART:

Q. Good morning, Miss Levine.

A. Morning.

Q. Are you employed?

A. Yes.

Q. By whom?

A. Google.

Q. How long have you been employed by Google?

A. Since Google acquired YouTube in, I believe, November 2006.

Q. Okay. What's your current job title?

A. Associate general counsel for YouTube of Google.

Q. Has your job title changed in any way since you have been employed by Google?

MR. KRAMER: Objection. Vague.

THE WITNESS: Yes. So I was associate general counsel.

10:25:57 BY MR. HART:

10:25:58 Q. Uh-huh.

10:25:58 A. For Google. Then I was associate general counsel, YouTube, for Google.

10:26:01

10:26:05 Q. Uh-huh.

10:26:06 A. And I also have the title of chief counsel, YouTube.

10:26:08

10:26:10 Q. Okay. And when did you assume the title of chief counsel, YouTube?

10:26:13

10:26:15 A. That was -- so I have two titles. One is a YouTube title, and one is a Google title. So the chief counsel, YouTube was immediately prior -- post the acquisition.

10:26:19

10:26:23

10:26:26

10:26:27 Q. Got you. Thank you.

10:26:34 I'm going to mark and ask the court reporter to mark Exhibit 1, and she'll show that to you as soon as she marks it.

10:26:36

10:26:39

10:26:50 (Levine Exhibit Number 1 was marked for identification.)

10:26:50

BY MR. HART:

10:26:51 Q. And just take a brief minute to page through it, and the question will be, or is: Would you identify this document, Exhibit 1 for us, please?

10:26:54

10:26:58

10:27:01

10:27:02 A. This is a resume that I prepared after -- 10:27:08 or immediately, I think, before the acquisition 10:27:11 closed, so Google could determine how to place me in 10:27:16 its organization.

10:27:17 Q. Got you. And does it accurately reflect 10:27:19 your employment history prior to the acquisition by 10:27:25 Google?

10:27:25 MR. KRAMER: Are you just asking her 10:27:29 whether each of the jobs that she's had is reflected 10:27:32 accurately --

10:27:33 MR. HART: Yeah.

10:27:34 MR. KRAMER: -- or are you asking if the 10:27:35 entire thing is accurate?

10:27:37 MR. HART: You know, we'll stick with the 10:27:39 prior point of history right now.

10:27:41 MR. KRAMER: Yes.

10:27:41 BY MR. HART:

10:27:41 Q. Is it accurately reflected in this resume, 10:27:45 Exhibit 1?

10:27:46 A. I don't, upon looking at this now, see any 10:27:48 inaccuracies.

10:27:49 Q. Okay. Fair enough.

10:27:52 It says under the heading "Associate 10:27:58 General Counsel RealNetworks, Inc.," on page 1 -- do

11:17:17 pornography?

11:17:18 A. At -- at -- at some point, yes.

11:17:20 Q. Okay. And is -- how are those guidelines

11:17:25 effectuated or implemented at YouTube, other than

11:17:28 having a guideline?

11:17:31 MR. KRAMER: So in answering this

11:17:34 question, I'd like you to be careful not to reveal

11:17:38 privileged communications between yourself, other

11:17:40 lawyers, and your client, that is, employers of

11:17:43 YouTube.

11:17:44 I think he's asking -- not asking for you

11:17:45 to do so.

11:17:46 MR. HART: No.

11:17:46 MR. KRAMER: I think he's asking for the

11:17:47 facts about --

11:17:48 MR. HART: Uh-huh.

11:17:48 MR. KRAMER: -- what goes on at YouTube to

11:17:49 implement the -- the pornography policy.

11:17:52 MR. HART: Uh-huh.

11:17:54 THE WITNESS: So generally speaking, the

11:17:57 way that we handle pornography on YouTube is through

11:18:02 a -- a system of community flagging.

11:18:05 BY MR. HART:

11:18:06 Q. Uh-huh. What is that?

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11:18:12 A. Users, viewers of YouTube --

11:18:16 Q. Uh-huh.

11:18:16 A. -- have the ability to flag content when they're watching it, or that they believe is -- violates our terms of service.

11:18:27 Q. Okay.

11:18:27 A. And then that content goes into a re- -- gets reviewed --

11:18:34 Q. Uh-huh.

11:18:35 A. -- by --

11:18:39 MR. HART: David's giving me hints.

11:18:41 MR. KRAMER: No, you're -- you're saying "okay" and "uh-huh" as she's answering the question, rather than letting her finish the answer.

11:18:48 MR. HART: Sorry.

11:18:50 MR. KRAMER: I know it's not intentional. I am sure I do stuff like that too, but I'd just like her to be able to finish the answer without being interrupted by an "uh-huh" or an "okay." I know you didn't do it on purpose.

11:19:00 BY MR. HART:

11:19:01 Q. I'm not saying a thing. Please continue.

11:19:04 A. So there are -- there -- a group of employees --

11:19:07 Q. Uh-huh.

11:19:08 A. -- who will review flagged content and do their best to make a determination as to whether it, in fact, violates the terms of service policy at issue, in this example, whether it's pornography.

11:19:25 Q. Okay. Have you completed your answer?

11:19:27 A. Yes.

11:19:27 Q. Thank you.

11:19:34 When you say content is "flagged," is it flagged by the user? And in doing so, does the flag send some message of some sort to somebody internally, YouTube, to review the flagged content?

11:19:59 MR. KRAMER: The question is vague as to "user."

11:20:01 THE WITNESS: Yeah, there is -- there's many parts -- there's many parts of that.

BY MR. HART:

11:20:06 Q. Uh-huh.

11:20:07 A. So why don't you ask each part separately?

11:20:09 Q. Okay. I -- my question is actually simpler than it sounded. So let me just rephrase it, which is: Can you just explain very briefly how the flagging system operates functionally?

11:20:19 A. Yes.

11:20:20 MR. KRAMER: Calls for -- doesn't call for speculation.

11:20:22 THE WITNESS: Well --

11:20:22 MR. KRAMER: Go ahead.

11:20:22 THE WITNESS: -- at a -- at a general level, I mean, I'm not an engineer. I'm not qualified --

11:20:25 BY MR. HART:

11:20:26 Q. No, no, no.

11:20:28 A. General level, a -- somebody viewing -- anybody that's viewing content --

11:20:30 Q. Uh-huh.

11:20:32 A. -- has the ability to check a box that says -- indicates they believe it's a violation of YouTube's terms of service.

11:20:35 And such checking -- generally speaking, there's -- it gets a little complicated, but, generally speaking, might result in the review of that content by an employee of YouTube.

11:20:42 Q. Okay. That -- that was really the point of my question. You mean by a viewer checking something or flagging something, does it, in some way, send a signal to someone at YouTube to take a look at the particular video that has been so

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speculation.

THE WITNESS: I believe in the early days it -- it may have.

BY MR. HART:

Q. Do you -- do you know when that changed?

MR. KRAMER: Calls for speculation and lacks foundation.

THE WITNESS: I'm not exactly sure.

BY MR. HART:

Q. Can you approximate in relation to the Google acquisition?

MR. KRAMER: Same objections. Calls for speculation, lacks foundation.

THE WITNESS: No.

BY MR. HART:

Q. Okay. How does YouTube implement its content policy against violent videos?

A. It's the same way that I already described.

Q. Community flagging?

A. Yes.

Q. Okay. Was there, at any time, any person or persons functioning at YouTube who were proactively looking on YouTube for violent videos

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13:23:58 (Levine Exhibit Number 4 was marked for
13:23:58 identification.)
13:23:59 BY MR. HART:
13:24:38 Q. I guess, to save time, to the extent that
13:24:42 you can --
13:24:42 A. Okay.
13:24:43 Q. -- the two threshold questions are whether
13:24:45 you can identify what we've just marked as Exhibit
13:24:48 4, and whether you were involved in any way in its
13:24:52 negotiation.
13:24:53 MR. KRAMER: Take those one at a time.
13:25:03 THE WITNESS: Yes, this appears to be a
13:25:05 content license with Wind-Up Records.
13:25:08 BY MR. HART:
13:25:09 Q. And were you involved in negotiating any
13:25:11 sort of content license with Wind-Up Records for
13:25:15 YouTube?
13:25:15 A. I don't think I was the primary negotiator
13:25:16 on this deal, but I may have been consulted a couple
13:25:20 of times.
13:25:21 Q. You were aware that a deal --
13:25:22 A. I am aware that we had --
13:25:22 Q. -- had to be struck --
13:25:22 A. Yeah. Yes, I was aware that a deal had

16:00:37 don't know how they were able to discern.

16:00:40 Q. Uh-huh. And do you have any knowledge about what search terms were used, or -- yeah, what search terms were used?

16:01:00 A. Specifically?

16:01:02 Q. Or generally, how did -- how did -- you said they searched metadata. I guess my question is: Do you know how they knew what to search?

16:01:15 MR. KRAMER: Objection. Assumes facts, calls for speculation.

16:01:19 And again, he's not asking -- he's not asking you to reveal the substance of attorney-client communications. So you -- to the extent he is, I instruct you not to answer the question.

16:01:34 BY MR. HART:

16:01:35 Q. I'm not --

16:01:36 A. Yeah. I don't know specifically any particular searches.

16:01:43 Q. Uh-huh.

16:01:43 A. I can speculate as to what I think they probably or might have done.

16:01:47 Q. And what's that?

16:01:48 A. Perhaps they would have put in "American

16:01:51 Idol," for example, if they were scanning for
16:01:57 American Idol.
16:01:58 Q. And why do you speculate that they might
16:02:01 have done that?
16:02:11 A. Because if somebody did upload an
16:02:13 unauthorized copy of American Idol and wanted other
16:02:17 people to view it, they might use that -- those
16:02:23 words in the metadata so other -- so it would come
16:02:26 up among other results in the search results.
16:02:30 Q. Right. But why would someone at YouTube
16:02:36 decide to search for American Idol, as opposed to
16:02:40 all of the other possible searches that they could
16:02:44 do?
16:02:45 A. I think I --
16:02:46 MR. KRAMER: Hang on. Calls for
16:02:47 speculation. Incomplete hypothetical. The question
16:02:57 is vague.
16:02:57 BY MR. HART:
16:03:00 Q. But other than that, Miss Levine?
16:03:04 A. Well, for -- so with respect to American
16:03:12 Idol --
16:03:13 Q. Uh-huh.
16:03:13 A. -- American Idol -- American Idol, I -- I
16:03:23 recall was a company --

16:15:57 THE WITNESS: I -- I don't recall any
16:15:58 conversations --
BY MR. HART:
16:15:59 Q. Okay.
16:15:59 A. -- about it.
16:16:00 Q. Now, did there come a point at YouTube
16:16:02 when there was a decision made to stop any sort of
16:16:05 proactive scanning of content for potential
16:16:10 copyright infringement?
16:16:28 MR. KRAMER: I'll object to the form of
16:16:29 the question.
16:16:30 You can answer.
16:16:35 THE WITNESS: I -- I don't recall a
16:16:37 specific time where a decision was made --
16:16:40 BY MR. HART:
16:16:40 Q. Uh-huh.
16:16:40 A. -- not to do that.
16:16:42 Q. Uh-huh. Did there come a point in time
16:16:45 when YouTube, in fact, stopped proactively scanning
16:16:49 for potentially copyright infringing content on the
16:16:54 YouTube site?
16:17:07 A. There's a sort of an assumption in your
16:17:09 question that there was an ongoing policy to do
16:17:13 that, which I don't necessarily think was the

16:17:16 ongoing policy. I think that in the early days
16:17:19 there were some efforts made to do that on behalf
16:17:25 of -- at certain times, you know, and at some point
16:17:31 we stopped making those efforts.
16:17:34 Q. Uh-huh. Do you know why, when you say
16:17:38 "we," YouTube stopped making those efforts?
16:17:41 MR. KRAMER: Let me object to that
16:17:42 question to the extent it calls for the disclosure
16:17:45 of confidential legal communications between
16:17:48 counsel, and between you and your client. To the
16:17:50 extent there is a non-legal reason, you can answer
16:17:53 the question.
16:17:57 MR. HART: Right now I just asked her if
16:17:59 she knows why. I didn't ask her to tell me what the
16:18:02 why was.
16:18:03 MR. KRAMER: Okay.
16:18:05 THE WITNESS: More or less.
16:18:06 BY MR. HART:
16:18:07 Q. Okay. Can you tell me why?
16:18:13 MR. KRAMER: Same instruction.
16:18:17 THE WITNESS: We found that we were
16:18:19 not very good at determining when content on the
16:18:24 site was or was not authorized by the copyright
16:18:31 owner.

17:30:40 BY MR. HART:

17:30:41 Q. Okay. Let me show you what we've marked as Exhibit 24, and ask you if you have ever seen that document before.

17:31:56 Have you had a chance to read that e-mail yet?

17:31:58 A. Yes, I have.

17:31:59 Q. Okay. See where it says:

17:32:01 Even if a video of a certain program is deleted, the same content is uploaded again, over and over?

17:32:07 A. Yes.

17:32:09 Q. Is that a problem at YouTube?

17:32:11 MR. KRAMER: Wait. The question is vague. It's vague -- the question is vague. I'll object to the form of the question.

17:32:33 THE WITNESS: I don't know what this gentleman is talking about, because I can't read his mind -- or her. I don't know if it's a man or a woman.

23:59:57 BY MR. HART:

17:32:43 Q. Uh-huh.

17:32:45 A. But I don't -- my guess is that they're not talking about identical content being uploaded

17:32:51 again and again.

17:32:52 Q. Uh-huh. Because otherwise an MD5 hash

17:32:58 would catch it?

17:33:00 A. Correct.

17:33:00 Q. And what if the first video is three

17:33:05 minutes of a program, and the next upload of

17:33:13 essentially the same content is edited to be two

17:33:16 minutes and 59 seconds? I think you told us earlier

17:33:21 the MD5 hash won't catch that, will it?

17:33:25 A. Probably not.

17:33:27 Q. Does YouTube fingerprint content that has

17:33:34 been identified pursuant to DMCA take-downs --

17:33:39 notices?

17:33:40 MR. KRAMER: Objection to the term

17:33:42 "fingerprinting" as vague.

17:33:44 MR. HART: Uh-huh.

17:34:01 THE WITNESS: Not as a general matter, no.

17:34:03 BY MR. HART:

17:34:05 Q. Does it do that for premium content

17:34:08 partners?

17:34:10 A. No, no, not as a general matter, no.

17:34:13 Q. Okay. Does the three strike rule apply to

17:34:22 your premium content partners?

17:34:28 MR. KRAMER: Objection. Today?

18:11:27 MR. KRAMER: She can answer.

18:11:27 BY MR. HART:

18:11:28 Q. Uh-huh.

18:11:30 A. I'm aware of the decision being discussed in this e-mail.

18:11:34 Q. Okay. Did you take part in that decision?

18:11:43 MR. KRAMER: Objection. Question is vague.

18:11:45 You can answer.

18:11:48 THE WITNESS: So I think it was the process of that decision, the attorney-client privilege.

18:11:54 MR. KRAMER: To the extent -- okay. Let me --

18:11:58 THE WITNESS: And that how the decision was made, I think was attorney-client privilege.

18:12:00 BY MR. HART:

18:12:01 Q. I simply asked whether you took part in the decision so far.

18:12:05 MR. KRAMER: Right. I think the question simply is whether or not you participated in the decision over whether to continue to show ads on all watch pages for user-generated content.

18:12:18 I would instruct you not, in the course --

18:12:22 in the course of answering this or future questions,
18:12:24 reveal attorney-client privileged communications,
18:12:28 that is, communications of a legal nature, but if
18:12:32 there are other communications or discussions in
18:12:34 which you participated that do not reflect
18:12:37 confidential attorney-client communications, those
18:12:40 you can reveal. I don't think this question calls
18:12:43 for it, but I --
18:12:46 MR. HART: I don't think so either.
18:12:48 THE WITNESS: You don't think the question
18:12:50 calls for what? Attorney --
18:12:54 MR. KRAMER: I don't the question here is
18:12:56 calling -- sorry.
18:12:56 THE WITNESS: Sorry.
18:12:56 MR. HART: Go ahead.
18:12:57 MR. KRAMER: I don't the question here is
18:12:57 calling for you to disclose attorney-client
18:12:58 communications at all. I think he's simply asking
18:13:01 whether you were involved in the process by which
18:13:03 the decision discussed in this exhibit were --
18:13:07 was --
18:13:07 THE WITNESS: Uh-huh.
18:13:07 MR. KRAMER: -- was reached.
18:13:08 THE WITNESS: I -- I may have been

18:13:09 involved in it.

18:13:10 BY MR. HART:

18:13:12 Q. Do you know the reason why that decision

18:13:14 was made?

18:13:15 MR. KRAMER: Okay. So same instruction.

18:13:17 MR. HART: All right.

18:13:18 MR. KRAMER: To the extent that there are

18:13:19 legal -- to the extent that there are privileged

18:13:21 communications to which you were a party, you're not

18:13:24 to reveal those, but to the extent there were

18:13:27 communications of a nonlegal nature, you can -- you

18:13:30 can disclose -- discuss those.

18:13:32 THE WITNESS: Okay. That's sort of hard

18:13:33 in my head, so I need to think about this for a

18:13:36 second.

18:13:37 BY MR. HART:

18:13:39 Q. Keep in mind, all I asked right now is:

18:13:41 Do you know the reason why the decision was made?

18:13:44 A. Well --

18:13:45 Q. Not --

18:13:45 A. Okay.

18:13:46 MR. KRAMER: Not what the decisions were?

18:13:48 MR. HART: Didn't ask that yet.

18:13:49 MR. KRAMER: Okay. You're right.

18:14:48 business.

18:14:49 Q. Uh-huh. Okay. Does YouTube currently

18:14:51 feature advertising on the search results pages of

18:14:55 the YouTube site?

18:14:57 MR. KRAMER: Objection. The question is

18:14:58 vague as to "feature."

18:14:59 BY MR. HART:

18:15:02 Q. All right. Fair enough. Let me rephrase

18:15:04 that question. David's been such a nice guy today.

18:15:08 Does YouTube currently have advertising on

18:15:11 the search results pages of the YouTube website?

18:15:16 MR. KRAMER: Calls for speculation.

18:15:18 MR. HART: That's where I draw the line,

18:15:20 David.

18:15:20 BY MR. HART:

18:15:21 Q. Go ahead.

18:15:22 A. Oftentimes it does.

18:15:23 Q. Uh-huh. And I show you what had been

18:15:25 previously marked as Exhibit 15 (sic) at the Reider

18:15:31 or Reider -- Reider deposition?

18:15:40 (Hands document.) One for you, two for

18:15:43 you.

18:15:51 And ask you if this Reider Exhibit 13 is a

18:15:58 fair representation of an ad appearing on a search

18:17:09 answer, but a nontechnical one would be better --
18:17:12 why the advertising that's shown on Reider Exhibit
18:17:16 13 is sports-related, and the content that the
18:17:19 advertising is being shown with on the search
18:17:24 results page is English Premier League content,
18:17:29 which is also generally sports-related?
18:17:34 MR. KRAMER: Calls for speculation, lacks
18:17:36 foundation, assumes facts.
18:17:43 THE WITNESS: Can you ask a shorter
18:17:44 question or --

BY MR. HART:

18:17:45 Q. Uh-huh.
18:17:46 A. -- be more specific?
18:17:47 Q. Is it just a coincidence that the
18:17:49 advertising is Puma or for Puma, which is a
18:17:53 sports -- sportswear company, and it appears in
18:18:01 conjunction with search results that are for the
18:18:03 English Premier League, which is a British football,
18:18:08 sports-oriented subject?
18:18:10 MR. KRAMER: Same objections. That is,
18:18:12 assumes facts, calls for speculation, lacks
18:18:15 foundation.
18:18:19 THE WITNESS: So the advertising that we
18:18:21 run in search results --

18:18:22 BY MR. HART:

18:18:22 Q. Uh-huh.

18:18:23 A. -- to my knowledge, does not have anything to do with the search results.

18:18:27 Q. So your testimony is that, to your knowledge, this is just a coincidence?

18:18:31 MR. KRAMER: Same objections.

18:18:32 THE WITNESS: No, I'm going to repeat what I said. It has nothing to do with the search results.

18:18:36 MR. KRAMER: I -- I -- go ahead.

18:18:40 THE WITNESS: It's not tied to the search results.

01:59:57 BY MR. HART:

18:18:43 Q. Okay. What is it tied to?

18:18:45 MR. KRAMER: Objection. Calls for speculation, assumes facts, lacks foundation to the extent you're referring to this document. I just -- I don't know what this document is.

18:18:54 BY MR. HART:

18:18:55 Q. Uh-huh. Do you know what it is tied to?

18:19:04 A. I believe that it is tied in some way, I don't know exactly how, to the search term that the user enters.